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IN THE

SUPREME COURT OF THE UNITED STATES

OCTOBER TERM, A. D. 1935

No. 375-376

NETTIE MEYER, ANNA JACOBSON, JACOB MEYERHOFF, JOSEPH MEYERHOFF, JULIUS MEYERHOFF, JOHN C. PANKIN and RAY MANN,

Petitioners,

vs.

KENMORE-GRANVILLE HOTEL COMPANY, et al.,

Respondents.

BRIEF OF RESPONDENTS IN OPPOSITION TO THE PETITION FOR WRIT OF CERTIORARI.

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CHRONOLOGY

Oct. 27, 1932—Kenmore-Granville Hotel Corporation, Debtor, acquired title of property in question (R. 50).

Feb. 4, 1935—Creditors' petition filed in District Court (R. 2).

Feb. 8, 1935—Complaint of Nettie Meyer filed in Superior Court of Cook County, Illinois (R. 160).

Feb. 13, 1935—Order of District Court approving creditors' petition (R. 36).

Feb. 25, 1935—Petition of Nettie Meyer to dismiss filed in District Court (R. 37).

Feb. 27, 1935—Order of District Court giving Committees leave to file plan (R. 131).

Mar. 20, 1935—Order of District Court denying Nettie Meyer's petition to dismiss and allowing her appeal therefrom (R. 93, 96).

Apr. 20, 1935—Objections of petitioners (except Nettie Meyer) to plan filed (R. 141).

Apr. 27, 1935—Proposed amendment to plan submitted by petitioners (other than Nettie Meyer) filed (R. 144).

May 20, 1935—Order of District Court approving plan of reorganization (R. 145); also order allowing Nettie Meyer's petition to appeal (R. 168).

May 28, 1935—Order of Circuit Court of Appeals dismissing appeal allowed by District Court March 20, 1935 (R. 105).

June 7, 1935—Petition of Nettie Meyer to Circuit Court of Appeals to allow appeal from order of May 20, 1935 (R. 172).

June 25, 1935—Order of Circuit Court of Appeals denying Nettie Meyer's petition for leave to appeal from order of May 20th (R. 177).

June 28, 1935—Motion of petitioners in Circuit Court of Appeals to consolidate causes, etc. (R. 178).

July 9, 1935—Order of Circuit Court of Appeals dismissing Nettie Meyer's appeal allowed by District Court May 20, 1935 (R. 182).

July 9, 1935—Order of Circuit Court of Appeals denying motion of June 28, 1935 to consolidate, etc. (R. 105).

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Petitioners,

vs.

KENMORE-GRANVILLE HOTEL COMPANY, et al.

Respondents.

BRIEF OF RESPONDENTS IN OPPOSITION TO THE PETITION FOR WRIT OF CERTIORARI.

To the Honorable, the Chief Justice and the Associate Justices of the Supreme Court of the United States:

Respondents, Kenmore-Granville Hotel Company, the debtor, J. Gold, R. Sandroff and S. Isenberg, petitioning creditors, and George W. Rossetter, Jay C. McCord and Sidney H. Kahn, members of the Sovereign and Sovereign

Annex First Mortgage Bondholders' Committees, respectfully submit their brief in opposition to the petition of Nettie Meyer, Anna Jacobson, Jacob Meyerhoff, Joseph Meyerhoff, Julius Meyerhoff, John C. Pankin and Ray Mann for a writ of certiorari.

STATEMENT OF THE CASE.

Introduction.

Running throughout the entire petition for a writ of certiorari is the contention that petitioner Nettie Meyer, the owner of $1300 of the more than $1,500,000 of outstanding bonds has been deprived of the right to prosecute her charges of fraud in the state court, by restraining orders entered in the District Court. This contention of the petitioners is wholly without merit for the reason that the judge of the District Court in dismissing Nettie Meyer's petition stated that he would not destroy any cause of action of any bondholder or group of bondholders against the trustees under the mortgages or against the bondholders' committee (R. 91); furthermore, in approving the plan of reorganization the District Court provided that any cause of action in the debtor or in any person, firm or corporation, for or in behalf of the debtor, should be preserved and passed on to the new or reorganized corporation (R. 154 and 164).

The petitioners contend and argue that 77B of the Bankruptcy Act as amended is invalid. However, the constitutionality of that section was not questioned in the District Court either in the petition of Nettie Meyer to dismiss the proceedings (R. 37) or in the objections of the other

petitioners filed to the plan of reorganization (R. 141) or otherwise. Therefore, petitioners are not in a position to ask this court to pass on the constitutionality of that section.

Petitioners contend that the Circuit Court of Appeals has held, in effect, that no appeal lies from an order confirming a plan of reorganization either by appeal from the District Court or by petition in the Circuit Court of Appeals to superintend and revise. The fact is the Circuit Court of Appeals followed *Campbell* v. *Alleghany Corporation,* 75 F. (2d) 947 and held that such an order may be reviewed by petition to that court to superintend and revise.

Since the District Court preserved the rights of the petitioner Nettie Meyer with respect to her suit in the state court, we deem it unnecessary to answer here the charges of fraud made in that court, except to say there is not a word of evidence in this case to support them.

STATEMENT OF THE FACTS.

The statement of the case set forth in the petition for writ of certiorari is inaccurate and insufficient in the following respects:

1. On page 2 of the petition it is stated:

"The new corporation did not assume the debts and was never in possession."

Kenmore-Granville Hotel Company, the debtor, which acquired the property in 1932 (R. 50), has expressly assumed the payment of the Sovereign and the Sovereign Annex first mortgage bonds (R. 77 and 160).

2. Petitioners, on page 2 of their petition, state that Nettie Meyer filed her complaint in the state court prior

to the approval of the creditors' petition in the District Court, thereby seeking to create the impression that the state court proceedings were instituted prior to those in the District Court. The creditors' petition for proceedings under section 77B of the Bankruptcy Act (11 U. S. C. A. §207) were filed February 4, 1935, while Nettie Meyer's complaint was filed in the state court four days thereafter, on February 8, 1935.

3. On page 3 of the petition for the writ it is stated that Nettie Meyer's petition in the District Court charges that S. W. Straus & Co., the house of issue, organized a bondholders' committee consisting of its officers. It omits to tell the court that two of the three members of the bondholders' committees who proposed the plan of reorganization to the District Court are George W. Rossetter and Jay C. McCord (R. 65), who are not and never were in any manner directly or indirectly associated with S. W. Straus & Co. or any of its affiliated companies (R. 161).

Subsequent to the approval of the creditors' petition as having been filed in good faith and the denial of Nettie Meyer's petition to dismiss the proceedings and to dissolve the restraining order previously entered, the District Court approved a plan of reorganization which provided *inter alia* as follows:

> 1. That a new corporation be organized with an issue of common stock to take over the assets of the debtor including The Sovereign and The Sovereign Annex properties;
>
> 2. That 90% of the stock of the new corporation be distributed among the holders of the two issues of first mortgage bonds upon the property (R. 124);
>
> 3. That 7½% of the stock of the new corporation be issued to S. W. Assets Liquidation Corporation in payment of subordinated and unsubordinated advances

made by S. W. Straus & Co. amounting to approximately $322,441.25 (R. 125);

4. That 2½% of the common stock of the new corporation be issued to Nomis-Suarts Corporation, the holder of all of the capital stock of the debtor and an unsecured creditor in the amount of approximately $73,371.45 (R. 125);

5. That a voting trust of the stock be created, unless a majority in amount of the stock vote against it in a referendum to be held for that purpose (R. 124);

6. That two of the three trustees of the voting trust be appointed by the court, the third by the bondholders committees subject to the approval of the court;

7. That all stockholders shall be at liberty at any time to withdraw their stock from the voting trust.

Opinion of Circuit Court of Appeals

The Circuit Court of Appeals rendered and filed a memorandum opinion on June 25, 1935, in connection with the denial of leave to appeal from the District Court order of May 20, 1935, which opinion is attached to this brief as "Appendix," an order entered by it on that day which is attached to this brief as "Appendix."

ARGUMENT.

(For the convenience of the Court, a chronology of pertinent events appears opposite page 1.)

Circuit Court of Appeals Orders Involved.

Petitioners Nettie Meyer, Anna Jacobson, Jacob Meyerhoff, Joseph Meyerhoff, Julius Meyerhoff, John C. Pankin and Ray Mann pray the issuance of a writ of certiorari to review the following decisions of the United States Circuit Court of Appeals for the Seventh Circuit, in two cases before that court, Nos. 5491 and 5531. (Petition for Writ, p. 1):

(1) Order of May 28, 1935 in case No. 5491, sustaining the motion of appellees to dismiss, and dismissing the appeal of *Nettie Meyer* prayed in and allowed by the United States District Court from an order of March 20, 1935 of that court (R. 105).

(2) Order of July 9, 1935 in case No. 5531, dismissing the appeal granted to "*Nettie Meyer, et al.,*" by the District Court of the United States from an order of that court of May 20, 1935 approving a plan of reorganization (R. 182).

(3) Order denying "prayer of the petition to appeal" to the Circuit Court of Appeals (Petition for Writ, p. 1).

Petitioners further state that they seek "a review of the whole case and to settle the practice in connection with appeals under 77B as well as the constitutionality of the whole act" (Petition for Writ, p. 9).

Circuit Court order of May 28, 1935, in case no. 5491.

This order of the Circuit Court of Appeals sustained the motion of appellees to dismiss and it dismissed the appeal of Nettie Meyer allowed by the District Court from an order of that court of March 20, 1935 (R. 105). The petition for this appeal in the District Court was made by only one of the seven petitioners here, namely, Nettie Meyer. The order appealed from denied the prayer of Nettie Meyer's petition "to dissolve the injunction and to dismiss the proceedings for lack of jurisdiction and for good faith" (R. 93). On February 13, 1935, the District Court had entered an order approving the creditors' petition as properly filed under Section 77B of the Bankruptcy Act, as amended, and restraining all creditors of the debtor from commencing or prosecuting any action against the debtor for the purpose of enforcing any lien or claim upon the property of the debtor or interfering with or disturbing the operation of the property of the debtor and from taking possession thereof until the further order of the court (R. 36).

The petition of Nettie Meyer to dismiss the creditors' petition for reorganization under Section 77B of the Bankruptcy Act and the order refusing to dismiss it, present "proceedings in bankruptcy," appealable only under Section 24(b) of the Bankruptcy Act (11 U. S. C. A. §47(b)) by application to the Circuit Court of Appeals. (*Credit Alliance Corp.* v. *Atlantic, Pacific & Gulf R. Co.*, (C. C. A., 8th Cir.), 77 F. (2d) 595, 597).

The restraining part of that order of February 13, 1935, enjoining creditors from prosecuting proceedings against the debtor or its property, which Nettie Meyer sought to dissolve, was also a step in the bankruptcy proceedings, appealable only by application to the Circuit Court of

Appeals. In *Credit Alliance Corp.* v. *Atlantic Pacific & Gulf R. Co.*, 77 F. (2d) 595 (C. C. A. 8th Cir.) the court said, at page 597:

> "The order enjoining the creditor, Credit Alliance Corporation from commencing or prosecuting any further action or actions to enforce its lien until the further order of the court was also a step in the bankruptcy proceeding, a 'proceeding in bankruptcy' not assuming to adjudicate upon any adverse claim to the property or presenting a 'controversy.' Such order also was appealable only under Section 24b."

(See also *Vitagraph, Inc.* v. *St. Louis Properties Corporation*, 77 F. (2d) 590 (C. C. A. 8th Cir.) and *St. Louis Can Co.* v. *General American Life Ins. Co., et al.*, 77 F. (2d) 598 (C. C. A. 8th Cir.).

Much of petitioners' brief is devoted to the proposition that the District Court in these proceedings has improperly interfered with the jurisdiction of the Superior Court of Cook County over the *res*. The Superior Court of Cook County never had possession of the property. At the time these proceedings were instituted the property was in the possession of Robert M. Sweitzer, County Treasurer, as receiver under the so-called "Skarda Act" (R. 159) in proceedings in the Circuit Court of Cook County, case No. 34-C-13891 (R. 36). The order of the District Court which approved the creditors' petition as having been filed in good faith continued the County Treasurer in possession of the property until the further order of that court (R. 36). The County Treasurer, as receiver, has not questioned the jurisdiction of the District Court over this property. Nettie Meyer is a creditor as a bondholder and has no adverse interest in the property.

Had Nettie Meyer perfected a proper appeal from the order of March 20, 1935, refusing to dismiss the proceed-

ings and to dissolve the injunction, she could not have raised therein any question as to the constitutionality of Section 77B for the reason that, as stated above, she raised no such question below. Even so, we submit that the question of constitutionality has been disposed of (*Continental Ill. Nat. B. Co.* v. *C. R. I. & P. Co.*, 294 U. S. .....; 79 L. ed. 642). We believe that what this court said in that case with respect to the validity of section 77 of the Bankruptcy Act as amended fully applies to section 77B.

Order of July 9, 1935 on appeal allowed by District Court.

This order entered in case No. 5531 (R. 182) dismissed the appeal granted to "Nettie Meyer, *et al.*," by the District Court from an order of that court of May 20, 1935 approving a plan of reorganization. The petition to the District Court for this appeal was made by "Nettie Meyer, in her own behalf and on behalf of other objectors represented by Shulman, Shulman & Abrams" and was signed "Nettie Meyer, Petitioner" (R. 166). The order of the District Court of May 20, 1935 appealed from, passed upon claims of creditors, approved (with modifications) the amended plan of reorganization, directed the further steps to be taken in consummating the reorganization, set the case for hearing on applications for fees, enjoined the holders of trust certificates (in the event a trust was created under the plan of reorganization) from commencing and prosecuting proceedings against the debtor, the new corporation, or any property either of the debtor or the new corporation and against the trustees, without the consent of court after notice to all parties; and enjoined the holders of bonds and coupons from commencing or prosecuting proceedings against the debtor, its successors or against the property of the debtor or the new corporation on such bonds or coupons (R. 157).

The Circuit Court of Appeals dismissed this appeal from this order of the District Court of May 20, 1935 on the ground that the order could properly be reviewed only on appeal allowed by the Circuit Court of Appeals, following *Campbell* v. *Alleghany Corporation*, 75 F. (2d) 947 (C. C. A. 4th Cir.), in which case there was a like holding. In this case Circuit Judge Parker said (p. 955):

> "For the reasons stated, we think that section 77B of the Bankruptcy Act is a constitutional and valid enactment, and that there was such acceptance by the bondholders of the plan of reorganization as warranted the court below in entering the order from which appeal was taken. As subdivision (k) of section 77B (11 U. S. C. A. §207 (k) provides that proceedings under that section shall be deemed 'bankruptcy proceedings' or 'proceedings in bankruptcy' and shall be governed by the provisions of the general bankruptcy act when same are not inconsistent with the provisions of the section, and as proceedings in bankruptcy, except in the three cases mentioned in section 25, as amended, 11 U. S. C. A. §48, are reviewable only by appeal to superintend and revise under section 24b, as amended, 11 U. S. C. A. §47 (b), it follows that the proper method of reviewing the order below was by appeal to superintend and revise under section 24b."

An additional reason for denying this appeal was that the person making it had no right to appeal. Nettie Meyer filed no claim, no objections to the plan of reorganization which was approved by the order of May 20, 1935, and did not join in the alternative plan proposed by certain creditors (R. 144) and did not participate in the District Court proceedings after the entry of the order of March 20, 1935 approving the creditors' petition (ex-

cept to present her various petitions for appeal). Accordingly, she had laid no foundation for an appeal from the order of May 20, 1935. "The other objectors" mentioned in Nettie Meyer's petition to appeal from the order of May 20, 1935 (R. 166) had no right to appeal from it as they did not join in the appeal. As said by the Circuit Court of Appeals in their memorandum opinion of June 25, 1935, if these "other objectors" desired to appeal they should have spoken for themselves (Appendix). The appeal bond filed and approved was that of Nettie Meyer alone (R. 166 and 96).

If Nettie Meyer had no right to appeal from the order of May 20, 1935 confirming the plan, it is not important whether the appeal prayed in the District Court was based on Section 24a of the Bankruptcy Act as involving a controversy or on Section 25 (11 U. S. C. A. §48) as involving a judgment granting a discharge. The order confirming the plan was not tantamount to a discharge in bankruptcy as is contended by the petitioners. Section 77B of the Bankruptcy Act, subdivision (h) provides:

> "Upon the termination of the proceedings a final decree shall be entered discharging the trustee or trustees, if any, making such provisions as may be equitable, by way of injunction or otherwise, and closing the case. Such final decree shall discharge the debtor from its debts and liabilities, and shall terminate and end all rights and interests of its stockholders, except as provided in the plan or as may be reserved as aforesaid."

The order confirming the plan of reorganization is not the final decree "closing the case."

Order denying petition to Circuit Court of Appeals to appeal.

Petitioners state that "the second appeal" was dismissed by the Circuit Court of Appeals on July 9, 1935 and "at the same time" the court denied "the prayer of the petition for leave to appeal" (Petition for Writ, p. 1). Petitioners make substantially the same statement in their brief in support of the petition (p. 9).

Petitioners seek to persuade the court that by an order entered July 9, 1935 (R. 105) the Circuit Court of Appeals denied their petition for leave to appeal from the order of May 20, 1935 confirming the plan. That order (R. 105, second order) was entered on the motion of the petitioners, supported by petition, (1) to consolidate cases No. 5491 and No. 5531, (2) to vacate the order (entered June 25, 1935) denying the application of Nettie Meyer for leave to appeal and to permit an amendment thereto, and (3) "to enter all orders in the consolidated causes, dismissing the appeals and *denying the application for leave to appeal* and to stay the mandate" (R. 179). The order entered July 9, 1935, overruled this motion and denied the petition presented in support of it (R. 105).

But it is important for the court to note that the Circuit Court of Appeals had prior to July 9, 1935, that is, on June 25, 1935, passed on a motion of Nettie Meyer (supported by petition) for leave to appeal from that order of May 20, 1935 (R. 171). The court denied this motion (R. 177) and rendered an opinion setting forth the court's reasons for so doing, as follows: (1) that Nettie Meyer made no objection to the plan in the District Court and submitted no alternative and therefore could not appeal; (2) that Nettie Meyer could not appeal on behalf of the others whom she pretended to represent—that if others desired to appeal from that order they should "speak for themselves" and (3) that Nettie Meyer

holding $1300 of bonds out of a total amount of over $1,000,000 of bonds, 95% of which had agreed to the plan, should not be permitted to delay the settlement of the estate (Appendix).

This motion of Nettie Meyer (and petition) was the only application made to the Circuit Court of Appeals for appeal from the order of May 20, 1935; and the order of June 25, 1935 was the only order of that court denying an application for such appeal. *No review of that order is sought here.* The court by its order of July 9, 1935 (R. 105), in effect, refused to re-enter in the consolidated cause the orders previously entered in the separate cases.

The petitioners apparently realized that the order of the Circuit Court of Appeals of June 25, 1935, denying the motion of Nettie Meyer for leave to appeal was sound; and they knew that, 35 days having elapsed, it was too late to file a new petition in the names of the other petitioners here. What the petitioners were unable to do directly, they sought to do indirectly by attempting to amend their petition filed June 7, 1935, to include "objectors" to the plan, but such amendment came too late.

In view of the fact that Nettie Meyer had no right to appeal from the order approving the plan and the other petitioners here did not join in any such appeal, it seems unnecessary to discuss the contention of petitioners that the plan was inequitable in that it allowed a 10% interest in the stock of the new corporation to certain junior interests. However, the record shows that this allowance was based on an advance of $396,900 to meet interest and principal prepayments on The Sovereign and The Sovereign Annex bonds (R. 160); that 7½% of the stock would be issued to S. W. Assets Liquidation Corporation, but that no one ever connected with S. W. Straus & Co. had any interest in that corporation; that 2½% of the stock would be issued to Nomis-Suarts Corporation (R. 160).

CONCLUSION.

Petitioners have attempted, without the order of this court, to consolidate the two cases Nos. 375 and 376. They have filed one transcript and one petition for a writ of certiorari in these cases. All that respondents have before them are the transcript and the petition for the writ. It is impossible to tell from these which case is numbered 375 and which one is numbered 376. The two cases involve different subject matter and different parties. Petitioners Anna Jacobson, Jacob Meyerhoff, Joseph Meyerhoff, Julius Meyerhoff, John C. Pankin and Ray Mann have no interest in the appeal from the order of March 20, 1935, involved in one case. The petitioner Nettie Meyer has no interest in the appeal from the order entered May 20, 1935, involved in the other case. The two appeals, though presented by the same counsel, are inconsistent and cannot be consolidated. While Nettie Meyer challenges the jurisdiction of the District Court, the other petitioners recognize and invoke it by proposing an amendment to the plan and participating in the hearing thereon.

The petitioners' brief contains no specification of the assigned errors intended to be urged, as required by Rule 27 of this court.

The Circuit Court of Appeals has not held as contended that there was no right to appeal either from the order of March 20, 1935 approving the creditors' petition, or the order of May 20, 1935 confirming the plan of reorganization. The court merely held that no proper appeal was taken from either order.

The petitioners' petition and brief disclose no special or important reason why this court should grant a review of the orders of the Circuit Court of Appeals. It is not shown that any of the orders of the Circuit Court of Appeals complained of is in conflict with the decision of any other Circuit Court of Appeals or that the court has decided any important question of general law in a way that is untenable or in conflict with the weight of authority.

We respectfully submit that the petition for a writ of certiorari should be denied.

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Appendix.

IN THE

UNITED STATES CIRCUIT COURT OF APPEALS

FOR THE SEVENTH CIRCUIT

Tuesday, June 25, 1935

Court met pursuant to adjournment and was opened by proclamation.

Before:

Hon. Evan A. Evans, Circuit Judge
Hon. William M. Sparks, Circuit Judge

In the Matter of KENMORE-GRANVILLE HOTEL COMPANY, A Corporation, Debtor;

NETTIE MEYER, et al.

5531 *vs.*

KENMORE-GRANVILLE HOTEL COMPANY, A Corporation, et al.

Appeal from the District Court of the United States for the Northern District of Illinois, Eastern Division.

Appellant, Nettie Meyer, has filed a petition wherein she requests this court to allow her to appeal from an order of the District Court entered on May 20, approving a plan of reorganization. The District Court allowed an appeal to be taken from the same order.

In a companion case this court dismissed an appeal allowed by the District Court from another order entered on March 20 by the District Court.

In disposing of this petition, we believe it advisable to set forth our views in writing so there may be no misunderstanding as to its significance.

Should this court in its discretion allow the appeal from an order of May 20 approving the plan of reorganization?

It would seem that the order can only properly be reviewed on appeal allowed by this court. See *Campbell* v. *Allegheny Corporation*, 75 F. (2d) 947. A reading of the petition discloses a somewhat anomalous situation. The petitioner is Nettie Meyer. She made no objection to the plan in the District Court and submitted no alternative. In her petition for leave to appeal she says that she filed it on her behalf and on behalf of objectors represented by Shulman, Shulman & Adams, who join in this petition. Only Nettie Meyer signed the petition, and therefore we assume that she is the only one who joined in the petition. The interest of the petitioner is perhaps $1300, whereas the total amount of the bonds is over one million. Ninety-five percent of the holders though had agreed to the plan. It is significant that the petitioner did not object to the plan, nor was one in opposition thereto or which was proposed as a more equitable plan, offered. She is delaying the settlement of this estate when ninety-five percent. of the outstanding bondholders want the plan carried out. It may be asserted that some other parties, who had objected to the plan in the District Court and the aggregate of whose claims amounted to approximately $9,000, support petitioner's request. Reference is made to one Anna Jacobson. If she was an objector, why did she not sign the petition?

Petitioner has no right to object to the order on her own account. She seeks to strengthen that right, however, by asserting her petition is drawn for others. The answer to this contention is,—let the others speak for themselves.

The petition for leave to appeal is denied, and a motion to dismiss the appeal allowed by the District Court will be entertained as being one from which the District Court may not allow an appeal.

UNITED STATES CIRCUIT COURT OF APPEALS
FOR THE SEVENTH CIRCUIT

I, Frederick G. Campbell, Clerk of the United States Circuit Court of Appeals for the Seventh Circuit, do hereby certify that the foregoing typewritten pages, numbered from 1 to 2, inclusive, contain a true copy of the memorandum by the Court, filed on the twenty-fifth day of June, 1935, in the case of *In the Matter of Kenmore-Granville Hotel Company Debtor; Nettie Meyer, et al., Appellants* v. *Kenmore-Granville Hotel Company, a Corporation, et al., Appellees* No. 5531, October Term, 1934, as the same remains upon the files and records of the United States Circuit Court of Appeals for the Seventh Circuit.

In Testimony Whereof I hereunto subscribe my name and affix the seal of said United States Circuit Court of Appeals for the Seventh Circuit, at the City of Chicago, this 4th day of September, A. D. 1935.

Frederick G. Campbell,
Clerk of the United States Circuit Court of Appeals for the Seventh Circuit.

(Seal)